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April 19, 2016

Hon. Stuart M. Bernstein, USBJ
Chambers
One Bowling Green
New York, NY 10004

Re: Adv. Pro. Nos. 10-04841, 10-04918 and 10-05143

Dear Judge Bernstein:

I am counsel for the defendants in the three above referenced Madoff avoidance actions.

On April 18, 2016, the Trustee filed a motion in excess of 100 pages seeking sanctions, contempt and other relief against the defendants in these actions. The motion is currently returnable on April 27, with opposition due on April 22, 2016.

As I am sure the Court is aware, Friday is the first day of Passover, and the holiday extends until April 30, 2016. I will be out of town, as will most of my clients.

I contacted opposing counsel to request an adjournment of the return date and due date for opposition to the next omnibus motion day, given the holiday, and that I needed time to prepare proper opposition. I was surprised, but my request was refused, and opposing counsel advised me that I needed to contact the Court.

Accordingly, I am requesting an adjournment of the Trustee's motion as well as the due date for opposition until the next omnibus motion date. In addition to the impending

holiday, which covers both the due date of the opposition papers and the return date of the motion, I would request a reasonable opportunity to confer with my clients and prepare our opposition to the motion.

If the Court has any questions, please have your clerk contact me at their earliest convenience.

Thank you kindly for your considerations in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Timothy Wedeen', written over a horizontal line.

Timothy Wedeen.

MEMORANDUM ENDORSEMENT AND ORDER

The motion is adjourned to May 18, 2016, at 10:00 a.m. Answering papers are due by May 6, 2016, at 5 pm, and reply papers, if any, are due by May 13, 2016 by 5 pm.

So ordered.

Dated: New York, NY
April 19, 2016

/s/ *Stuart M. Bernstein*
STUART M. BERNSTEIN
United States Bankruptcy Judge